Dear Ms. Cervantes,

Thanks for the opportunity to review the scope and content of the proposal to construct, operate, and maintain the Salton Sea Species Conservation Habitat (SCH) project. The following comments regarding issues that you may wish to address in development of a draft environmental impact statement/environmental impact report are provided for your consideration:

* * * * *This "proof-of-concept" project relies on adaptive management to make improvements. Suggest detailed information on monitoring plans be included;

* * * * *The draft plans call for SCH to have deep holes created from borrow pits. Suggest not making steep sided pits as it may promote stratification and anoxia of the deep water. It's a minor detail, but construction equipment tends to make steep sides when excavating. We have observed that traps placed in the deeper holes captured no fish. When placed in the exact same area, but at the surface, the trap came back loaded. Unless adequate mixing of the deep water can be ensured, the holes may not sustain habitat;

* * * * *The SCH plan calls for use of evapo-concentrated, high-salinity water from one pond to provide saline water for another series of salinity gradient ponds. There may be a selenium risk associated with this practice. Suggest the plan include an assessment of effects of using waters (including selenium and pesticides) that have been evapo-concentrated for mixing;

* * * * *Suggest water rights and access to water (paper and wet water) be addressed and secured prior to construction;

* * * * *Suggest clarification regarding proposed location of initial ponds. "Current" level of the Salton Sea changes daily, and as of 7/22/2010, is ranging about 0.10 foot above and below -231.20 ft;

* * * * *Project may benefit by drawing on science published and available from USGS/Reclamation shallow habitat project as part of the proof of concept;

* * * * *Suggest a review and citation of literature justifying proposed depths of ponds in SCH;

* * * * *Suggest inclusion of a discussion of fish species proposed to be the principal project focus (Natives, invasives, a combination of both?) This is critical when considering a variety of issues including potential depths of ponds;

* * * * *Suggest potential environmental consequences of establishing a sedimentation basin be addressed. (for example, components of SCH may develop into habitat capable of supporting Yuma clapper rails (YCR). Suggest an evaluation of Selenium exposure risk to YCR be included;

* * * * *Suggest science from the literature, recently completed, and ongoing studies, be used in establishing the goals, objectives, and triggers included in the adaptive management plan. Adaptive management is not the same as trial and error;

* * * * *"Special studies" are cited on p.5 and p. 7 of the Public Notice. Suggest some additional information on goal, objectives, scope, and anticipated contributions of special studies be included;

* * * * *Suggest incorporating an assessment of potential use of geothermal energy resources to selectively supplement heating of ponds for temperature-sensitive fish;

* * * * *Standards to which berms will be built will need to be clarified. Suggest impacts of diversions from the rivers on threatened and endangered species (in the rivers at the diversion points) be assessed;

* * * * *At public scoping sessions there was discussion about the EIR/EIS probably not containing a preferred alternative - suggest that the document address what are the eventual selection criteria and processes for selection of the preferred alternative in the final;

* * * * *Selenium -public access and recreational activities relative to public health threshold levels - Will SCH cause a public health risk to humans consuming fishes or birds from the SCH site? Suggest an evaluation of public access and recreation be included;

* * * * *Suggest specific information such as number of acres of each specific salinity regime that will be created and size of anticipated freshwater area be included; (freshwater being the river water quality);

* * * * *SCH is creating habitats that do not currently exist at the Salton Sea - suggest considering and assessing the increased exposure risk related to selenium in this new habitat relative to existing Salton Sea habitat;

* * * * *Effects of SCH development on Green house gases uptake and emissions relative to existing area of the Salton Sea - Suggest an assessment of uptake, including positive or negative rate, be included;

* * * * *Suggest an evaluation of Desert pupfish interactions with non-natives that are being encouraged as a forage base to include a discussion of what habitat attributes will be built into SCH to provide for the pupfish. Suggest evaluation of role of invasive species, termed "novel species" in the SCH summary documents, to understand interactions of anticipated invasive or exotic species in SCH be included;

* * * * *Suggest inclusion of a robust ecological analysis of Selenium, remediation and avoidance technologies (including a definition of specific endpoints for measuring effects and target action levels);

* * * * *Suggest inclusion of an evaluation of the rationale for use of freshwater for SCH (if proposed to be used) to replace saline water habitat at the Salton Sea.

If you have any questions or would like to discuss our comments in person, please let me know.

Harvey Lee Case. III
U.S. Geological Survey
Salton Sea Science Office
78-401 HWY 111, Suite R
La Quinta, CA 92253
Office: (760) 777-1574; Cell: (206) 920-0923
Fax: (760) 777-0164
Email: hlcase@usgs.gov